

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette, Craig Lassig, Katie Nelson,
Tannen Maury, and The Communications
Workers of America, *On behalf of themselves
and other similarly situated individuals,*

Court File No. 20-cv-01302 (WMW/DTS)

Plaintiffs,

v.

City of Minneapolis; Minneapolis Chief of
Police Medaria Arradondo *in his individual
and official capacity*; Minneapolis Police
Lieutenant Robert Kroll, *in his individual
and official capacity*; Minnesota
Department of Public Safety Commissioner
John Harrington, *in his individual and
official capacity*; Minnesota State Patrol
Colonel Matthew Langer, *in his individual
and official capacity*; and John Does 1-4, *in
their individual and official capacities,*

Defendants.

DECLARATION OF DULCE FOSTER

I, Dulce J. Foster, declare under penalty of perjury, as follows:

1. I am an attorney at Fredrikson & Byron, P.A. and we represent Plaintiffs Jared Goyette, Craig Lassig, Katie Nelson and Tannen Maury. I submit this Declaration in Support of Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Injunction Against the State Defendants and All Those in Active Concert or Participation with Them.

2. Attached as Exhibit 1 is a true and correct copy of the April 17, 2021 letter from Leita Walker to Governor Tim Walz, Defendants Harrington and Langer, and Dept. of Corrections Commissioner Paul Schnell bearing Bates Numbers STATEDEF0000211–219.

3. Attached as Exhibit 2 is a true and correct copy of Response to Plaintiffs' Expedited Discovery Requests to State Defendants (Set 1).

4. Attached as Exhibit 3 is a true and correct copy of General Order 21-10-013 bearing Bates Numbers STATEDDEF0000204–207.

5. Included as Exhibit 4 is a true and correct copy of a video file bearing Bates Number STATEDDEF0000208 (found on included flash drive).

6. Attached as Exhibit 5 is a true and correct copy of Response to Plaintiffs' Expedited Discovery Requests to State Defendants (Set 2).

7. Attached as Exhibit 6 is a true and correct copy of an email sent by Liz Kramer, Minnesota Solicitor General, to Patricia Beety at League of Minnesota Cities bearing Bates Numbers STATEDDEF00000003–5.

8. Attached as Exhibit 7 is a true and correct copy of a chain of emails between the Minnesota Attorney General's Office, the League of Minnesota Cities, City of Crystal Police Chief, and the heads of a number of OSN law enforcement agencies bearing Bates Numbers STATEDDEF00000001–5.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: May 5, 2021

/s/ Dulce D. Foster
Dulce J. Foster
Hennepin County, Minnesota